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October 26, 2013

VIA ELECTRONIC FILING

Hon. Michael H. Dolinger
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Joseph Hunter*, 13 cr. 521 (LTS)

Dear Magistrate Dolinger:

I represent Joseph Hunter in the above referenced matter. A detention hearing is scheduled before this Honorable Court on October 29, 2013 at 2:00pm. This matter was referred to this Court by the Hon. Laura Taylor Swain, who is currently engaged in a lengthy trial. I have spoken with Mr. Hunter's family and it is their strong desire for him to be released on bail. I propose the following package for this Court's consideration:

1. \$500,000 Personal recognizance bond co-signed by eleven (11) financially responsible persons, 2. the bond to be secured by \$1000,000 in equity from real estate owned by the co-signers. 3. home detention with electronic monitoring, defendant to be allowed out only for school, work, programs and counsel visits, 4. strict pretrial supervision, 5. travel restricted to the Southern District of New York and the Western District of Kentucky and 6. surrender of all passports and no new applications.

The defense believes that this package will ensure his return to court and meets the standards of the Bail Reform Act of 1984. I will proffer additional information during the hearing.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton

Marlon G. Kirton, Esq.

cc: Aimee Hector, Assistant United States Attorney (via electronic filing)
Michael Lockard, Assistant United States Attorney (via electronic filing)
Anna Skotko, Assistant United States Attorney (via electronic filing)